

# SUPPLIER CODE OF CONDUCT

















Supplier Code of Conduct



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**Supplier Code of Conduct** 

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# INTRODUCTION AND SCOPE

ISOVOLTA Group is strongly committed to acting with integrity. ISOVOLTA strives to be a preferred business partner and supports reliable and fair relations with its business partners.

Suppliers play an important role in ISOVOLTA's value chain. This ISOVOLTA Supplier Code of Conduct ("Code") has been created to define the requirements ISOVOLTA suppliers must comply with in their deal-ings with ISOVOLTA and its employees. The Code is based on ISOVOLTA's Code of Conduct and other internal policies as well as international conventions and standards.

In this Code the term "ISOVOLTA" refers to all ISOVOLTA Group companies.







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# **SCOPE**

This Code shall form an integral part of any agreement between ISOVOLTA and the supplier and it applies to all ISOVOLTA suppliers and their group companies as well as their employees and agents (hereinafter individually and collectively referred to as the "Supplier"). The Supplier is obliged to ensure that this Code is cascaded down and complied with throughout its own and also its suppliers' organi-zation. The Supplier shall proactively address any risk of viola-tion of the Code and shall implement appropriate channels and remediation mechanisms (such as a whistleblowing tool) and make these available to all of its employees and business partners.

# MONITORING AND COMPLIANCE

The Supplier will conduct periodical reviews to ensure compliance with the Code. In addition, ISOVOLTA shall have the right to conduct an on-site audit at any time with reasonable notice. Upon request of ISOVOLTA, the Supplier shall provide access to all relevant information and documents needed to verify the Supplier's compliance. Any non-compliance with the Code must be resolved as soon as possible. In case the Supplier, in the reasonable opinion of ISOVOLTA, has materially violated the Code, ISOVOLTA shall have the right to terminate the business relationship with the Supplier for good cause with immediate effect and without the Supplier having any right to any kind of compensation.

If, in the reasonable opinion of the Supplier, there is a serious concern of non-compliance with this Code, the Supplier shall report the matter at its earliest convenience to ISOVOLTA.





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# LABOR AND HUMAN RIGHTS

# **CHILD OR FORCED LABOR**

The Supplier shall not use child labor under any circumstances or engage subcontractors or suppliers that do so. The minimum working age is the age of completion of compulsory school, but under no circumstances under the age of 15 years. Young employees within the age range of 15 – 18 years shall not be exposed to work that is likely to harm their physical or mental health, safety or morals.

The Supplier is not to allow any form of forced labor, wage slavery, involuntary labor or other measures that are physically coercive, threatening, abusive or exploitative.

# DISCRIMINATION

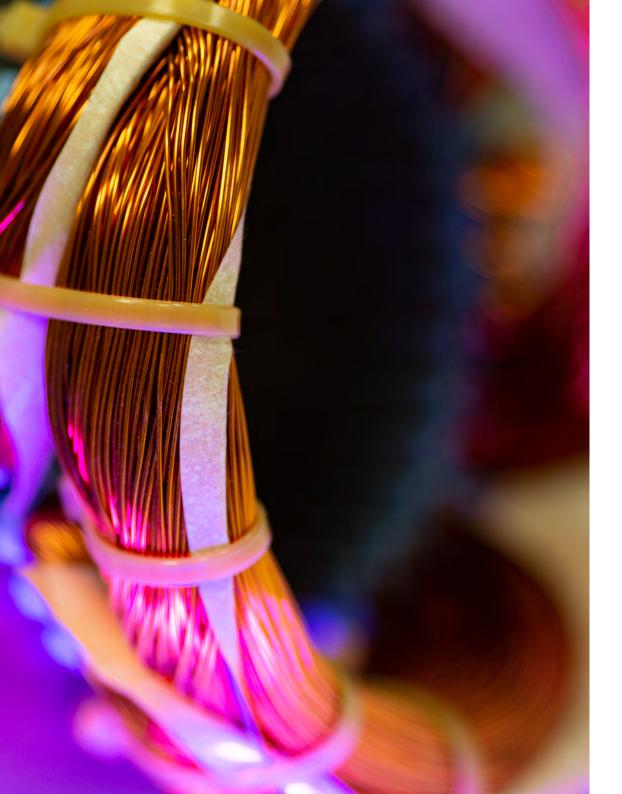
The Supplier shall be committed to offer equal opportunities in employment and education. The Supplier shall create an environment that is free from discrimination on the grounds of gender identity, marital status or pregnancy, race, age, sexual orientation, religious or political beliefs, impairment, family responsibility or family status or other similar characteris-tics which do not relate to the individual's qualifications or the inherent requirements for the job in question.

## RESPECT AND DIGNITY

The Supplier shall treat its employees with dignity and respect and ensure that all its employees benefit from a harassment-free working environment. No employee shall be exposed to verbal, psychological, physical or sexual harassment or abuse.

# **WORKING HOURS AND SALARY**

The Supplier shall ensure that the working hours and compensation paid to its employees comply with all applicable laws and regulations, including those relating to overtime hours and minimum wages. These conditions shall be provided to the employees in a format and language they can easily understand.



# FREEDOM TO ORGANIZE AND COLLECTIVE BARGAINING

The Supplier shall respect its employees rights to associate and bargain collectively in compliance with all applicable laws and regulations. The Supplier is to ensure that its employees are always able to communicate and share ideas and concerns openly with the management without any fear of discrimination or retaliation. If the freedom to associate or the right to collective bargaining are restricted by local laws, the Supplier shall allow other forms of employee representation and association.

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# HEALTH AND SAFETY

Health and safety are essential for ISOVOLTA operations and for all its workplaces. The safety and health of the Supplier likewise play an important role for ISOVOLTA. The Supplier shall provide a work environment that prevents occupational illnesses and work-related accidents in accordance with all applicable laws and regulations. Working environment shall also enhance the quality of the products or services of the Supplier and the consistency of its production and employee retention. Appropriate emergency procedures shall be identified and properly implemented, including appropriate health and safety information, training and equipment.





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# **ENVIRONMENT AND SUSTAINABILITY**

The Supplier is to ensure that its processes promote environmental protection, resource efficiency, responsible purchasing of raw materials (incl. CMRT) and occupational health and safety. In particular, the Supplier shall obtain, maintain and comply with all environmental permits, licenses and registrations necessary for its operations. The Supplier shall monitor, track and document its environmental performance and minimize environmental impact from its operations, products and services. The Supplier shall strive to reduce its CO2 emissions by increasing the use of renewable energies, reducing water energy consumption, more efficient use of raw- and packaging materials, minimizing waste, or any other relevant environmental factor in its business.

The Supplier is expected to handle potential environmental violations and complaints professionally and to communicate these to affected stakeholders.

The Supplier shall aim at eliminating the use of hazardous substances and rather substitute them by less dangerous materials. As applicable, given the field and extent of Supplier's business, those materials must be reported in the IMDS data-base throughout the entire supply chain, as well as declared, handled, transported and recycled in the specified way.





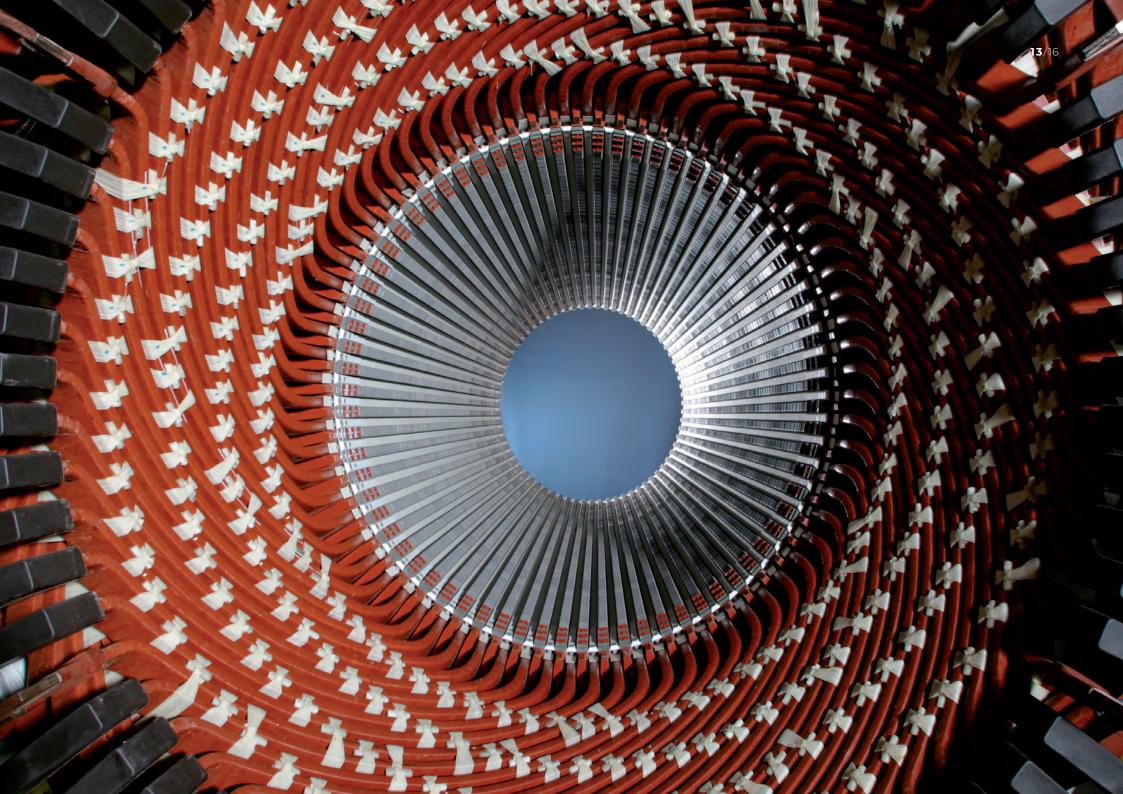
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# RESPONSIBLE SOURCING OF RAW MATERIALS

The Supplier is expected to understand the source of the raw materials used in its products. The Supplier shall especially follow OECD Due Diligence guidelines with respect to sourcing, extraction and handling of tantalum, tin, tungsten, gold and cobalt. In addition, the Supplier shall reliably determine the origin and source of such minerals in order to ensure that sourcing of such minerals does not directly or indirectly finance or benefit any armed groups, directly or indirectly breach human rights or negatively impact the environment.







# **BUSINESS CONDUCT**

# COMPLIANCE WITH LAWS AND REGULATIONS

The Supplier shall comply with all applicable laws and regulations, including applicable export control laws, international trade sanctions and customs regulation. The Supplier is strongly encouraged to observe all applicable international and industry standards and best practices. If local practices or customs are in contradiction with this Code, the Supplier shall comply with the Code.

# **ANTI-CORRUPTION**

The Supplier is to have a zero-tolerance policy regarding all kinds of corruption, such as bribery and embezzlement. The Supplier commits to conduct its business in an ethical manner by maintaining a culture of transparency, openness, compliance and integrity. Bribery is defined as providing, offering or accepting something of value - i.e. a benefit - to or from a third party, whether directly or indirectly, with the intention of improperly gaining some kind of advantage e. g. influencing an action or decision. Bribes may take the form of gifts, entertainment and hospitality or any other kind of benefit or advantage.



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Customary and reasonable business courtesies are permitted as long as these are given in compliance with applicable laws. The Supplier must not, however, provide such a courtesy to an ISOVOLTA employee or his/her family members in a situation where it might influence or appear to influence such employee's decision in relation to the Supplier.

## **FAIR COMPETITION**

The Supplier shall support and strive for fair competition and free markets and refuse to enter into discussions or agreements with competitors concerning pricing, market shares, or other similar activities. The Supplier shall adhere to all applicable laws and regulations and also request all of its employees to comply therewith.

# **CONFLICTS OF INTEREST**

The Supplier shall avoid any interaction with employees of ISOVOLTA if this is in conflict with or appears to be contrary to the employee's obligation to act in the best interests of ISOVOLTA.

## INTELLECTUAL PROPERTY

The Supplier shall comply with all applicable laws and international treaties on intellectual property rights. The Supplier shall prevent any infringement of ISOVOLTA's or any third party's intellectual property rights.

## INFORMATION SECURITY

The Supplier shall protect and carefully handle confidential material and information of ISOVOLTA and its stakeholders. The Supplier may not disclose or use confidential information of ISOVOLTA or its stakeholders for any other purpose than those agreed upon with ISOVOLTA.

## **DATA PRIVACY**

The Supplier acknowledges that it is necessary for the cooperation to exchange and allow the use of certain contact data of relevant persons in relation to carrying out the purpose of the business relationship. The Supplier shall process and treat such data in accordance with applicable laws observing mandatory personal data processing principles and in any event in a safe and secure manner preventing unauthorized access, use or disclosure. The Supplier ensures that all its data provided by it to ISOVOLTA has been collected and processed according to applicable laws. Each Party will use adequate contractual and technical mechanisms to protect this data.

# **CONTINUOUS IMPROVEMENT**

ISOVOLTA is committed to continuous improvement. The Supplier is to be dedicated to implement the Code throughout its value chain and to continuously seek for improvement areas.





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